

March 3, 2020

LISA PERENCHIO
EPA REGION 5
77 WEST JACKSON BLVD WU 16J
CHICAGO IL 60604

RE:

ER20-465

Burnett A3-18, Gas Production Well to Injection Well Conversion, Sec. 18, T30N, R6W,

Chestonia Township, Antrim County (EPA)

Dear:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the above-cited undertaking at the location noted above. Based on the information provided for our review, it is the opinion of the State Historic Preservation Officer (SHPO) that <u>no historic properties are affected</u> within the area of potential effects of this undertaking.

This letter evidences the EPA's compliance with 36 CFR § 800.4 "Identification of historic properties," and the fulfillment of the EPA's responsibility to notify the SHPO, as a consulting party in the Section 106 process, under 36 CFR § 800.4(d)(1) "No historic properties affected." If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

We remind you that federal agency officials or their delegated authorities are required to involve the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties per 36 CFR § 800.2(d). The National Historic Preservation Act also requires that federal agencies consult with any Indian tribe and/or Tribal Historic Preservation Officer (THPO) that attach religious and cultural significance to historic properties that may be affected by the agency's undertakings per 36 CFR § 800.2(c)(2)(ii).

The State Historic Preservation Office is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking.

If you have any questions, please contact Brian Grennell, Cultural Resource Management Coordinator, at 517-335-2721 or by email at GrennellB@michigan.gov. Please reference our project number in all communication with this office regarding this undertaking. Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

Brian G. Grennel

Cultural Resource Management Coordinator

for Brian D. Conway

State Historic Preservation Officer

BGG:SAT:Irp

Copy: Natalie Schrader, Riverside Energy Group





January 29, 2020

State Historic Preservation Office Michigan Economic Development Corporation 300 N. Washington Square Lansing, MI 48913

Attn: Ms. Martha MacFarlane-Faes,

State Historic Preservation Officer

Re: Burnett A3-18, Chestonia Township, Antrim County

Well Conversion from gas Production Well to CO2 Injection Well

Dear Ms. MacFarlane-Faes,

Please review the following information on our new project and injection well site. The name of the project is Burnett A3-18 and it's located in the NW/NW/NE of Section 18, T30N-R6W, Chestonia Township, Antrim County, 550 ft from the North section line & 2474 ft from the East section line. Enclosed is the survey record of well location and the supplemental plat highlighting well's exact location.

Please note that this is an existing well site; the well has been drilled back in 2003 and has been a natural gas production well since. Riverside has plans to convert this gas well into an injection well.

No drilling operations are anticipated at this location as part of conversion process. Drilling pad already in existence. Minimal dirt work is anticipated and is related to flowline hookup. Any activities at this location should have only a minimal to no effect on the ecological species, to our knowledge, known to exist within the vicinity of the well site.

During conversion operations, all environmental aspects will be considered and respected. Operation of an injection well at this location should have little or no effect on future population patterns.

All slopes are already established and maintained to prevent erosion during normal well operation. We do not anticipate any erosion problems at this location.

The proposed site is not zoned.

Also please note contact information for the permitting agencies:

Michigan Department of Environment, Great Lakes & Energy (EGLE)

Contact person – Mark Cromell EGLE Gaylord Field Office 2100 West M-32 Gaylord, ML 49735

Gaylord, MI 49735 Phone: (989)705-3407

Email: cromellm@michigan.gov

#### US EPA

Contact person – Ms. Lisa Perenchio Underground Injection Control Region 5, WU 16 J 77 West Jackson Boulevard Chicago, IL 60604

Phone: (312) 886-6593 Fax: (312) 886-4235

Email: perenchio.lisa@epa.gov

Matali Schrady

Should you have any questions or require additional information regarding this proposal, please contact Mr. Phil Koro at (231) 995-4096 or reach him at <a href="mailto:pkoro@riversideem.com">pkoro@riversideem.com</a>

Sincerely,

Natalie Schrader,

Compliance Coordinator

Enclosures:

ach: Burnett A3-18 SHPO Letter 01-2020.docx

Cc: Lisa Perenchio, US EPA

Mark Cromell, EGLE Gaylord

# STATE HISTORIC PRESERVATION OFFICE Application for Section 106 Review

SHPO Use On	
L IN	Received Date / / Log In Date / /
DUT	Response Date / / Log Out Date / /
	Sent Date / /
must be con only the info	copy for each project for which review is requested. This application is required. Please type. Applications applete for review to begin. Incomplete applications will be sent back to the applicant without comment. Send remation and attachments requested on this application. Materials submitted for review cannot be returned.
⊠ THIS	I. GENERAL INFORMATION  S IS A NEW SUBMITTAL THIS IS MORE INFORMATION RELATING TO ER#
a.	Project Name: BURNETT A3-18 WELL CONVERT GAS PRODUCTION WELL TO AN INJECTION WELL
b.	Project Address (if available): NOT AT SITE. Lat 45.0019481, Long -85.0793695.
	Municipal Unit: CHESTONIA TWP County: ANTRIM CO.
d.	Federal Agency, Contact Name and Mailing Address (If you do not know the federal agency involved in your project please contact the party requiring you to apply for Section 106 review, not the SHPO, for this
	information.): Lisa Perenchio, UIC Branch (WU-16J), US EPA, Region 5, 77. W. Jackson Blvd., Chicago, IL
	60604
e.	State Agency (if applicable), Contact Name and Mailing Address: Michigan Department of Environment, Great
f.	Lakes, and Energy, Oil, Gas, and Minerals Division, P.O. Box 30256 Lansing, Michigan 48909-7756 Consultant or Applicant Contact Information (if applicable) including mailing address: Natalie Schrader, Compliance Coordinator, Riverside Energy Group, 10691 E Carter Rd #201, Traverse City, MI 49684. Phone: 231-994-4001. Email: nschrader@riversideem.com
DOES T	ND DISTURBING ACTIVITY (INCLUDING EXCAVATION, GRADING, TREE REMOVALS, UTILITY INSTALLATION, ETC.) THIS PROJECT INVOLVE GROUND-DISTURBING ACTIVITY? YES NO (If no, proceed to section III.) roject location must be submitted on a USGS Quad map (portions, photocopies of portions, and electronic maps are acceptable as long as the location is clearly marked).
b. c. d.	USGS Quad Map Name: Chestonia Township: T30N Range: R06W Section: 18 Description of width, length and depth of proposed ground disturbing activity: NONE Previous land use and disturbances: A 232' x 194'(averaged) Nateral Gas well site was constructed in approximately 2003 and has been maintained as a Natural Gas production site to current. Current land use and conditions: Natural Gas well production site.  Does the landowner know of any archaeological resources found on the property?   YES  NO Please describe:

## III. PROJECT WORK DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE) Note: Every project has an APE.

a. Provide a detailed written description of the project (plans, specifications, Environmental Impact Statements (EIS), Environmental Assessments (EA), etc. <u>cannot</u> be substituted for the written description): NO EARTH CHANGE IS INTENDED FOR THIS PROJECT. THE DRILLING RIG WILL BE ERECTED OVER THE EXISTING GAS WELL AND WILL USE THE WELL BORE AND DEEPEN IT TO THE DESIRED HORIZON FOR THE BRINE INJECTION. ALL OF THE INFRASTRUCTURE FOR THE INJECTION WELL IS IN PLACE, SUCH AS THE ACCESS ROAD, THE DRILLING PAD, PIPELINE SYSTEM, UNDERGROUND ELECTRICITY.

- b. Provide a localized map indicating the location of the project; road names m se included and legible
- c. On the above-mentioned map, identify the APE.
- d. Provide a written description of the APE (physical, visual, auditory, and sociocultural), the steps taken to identify the APE, and the justification for the boundaries chosen. THIS WELL PAD IS SURROUNDED BY HARDOOD FOREST AND ROLLING HILLS. IT IS LOCATED IN A 80 ACRE TRACT THAT IS PART OF 660+ ACRES OF COMMONLY OWNED LAND. THERE WILL BE NO IMPACT OTHER THAN THE NOISE GENERATED BY THE DRILLING RIG, WHILE DRILLING IS TAKING PLACE.

### IV. IDENTIFICATION OF HISTORIC PROPERIES

a.	List and date <u>all</u> properties 50 years of age or older located in the APE. If the property is located within a Nation Register eligible, listed or local district it is only necessary to identify the district: NONE					
b.	Describe the steps taken to identify whether or not any <b>historic</b> properties exist in the APE and include the level					
	of effort made to carry out such steps: THIS WELL PAD SITE WAS CONSTRUCTED IN 2003 IN AN OTHERWISE UNDEVELOBED HARDWOOD FOREST. NO HISTORIC PROPERTIES ARE KNOWN.					
c.	Based on the information contained in "b", please choose one:					
	Historic Properties Present in the APE					
	No Historic Properties Present in the APE					
d.	Describe the condition, previous disturbance to, and history of any historic properties located in the APE: THERE ARE NO HISTORIC WITHIN THE APE OF THIS PROJECT.					
	V. PHOTOGRAPHS					
	Note: All photographs must be keyed to a localized map.					
	Provide photographs of the site itself.					
D.	Provide photographs of all properties 50 years of age or older located in the APE (faxed or photocopied photographs are not acceptable).					
VI. DETERMINATION OF EFFECT						
_	1					
L	No historic properties affected based on [36 CFR § 800.4(d)(1)], please provide the basis for this determination.					
	No Adverse Effect [36 CFR § 800.5(b)] on historic properties, explain why the criteria of adverse effect, 36 CFR Part 800.5(a)(1), were found not applicable.					
	Adverse Effect [36 CFR § 800.5(d)(2)] on historic properties, explain why the criteria of adverse effect, [36 CFR Part 800.5(a)(1)], were found applicable.					

Please print and mail completed form and required information to:
State Historic Preservation Office, Cultural Resources Management and Planning Section,
735 East Michigan Avenue, P.O. Box 30044, Lansing, MI 48909

JINERALS DIVISION

### SURVEY RECORD OF WELL LOCATION

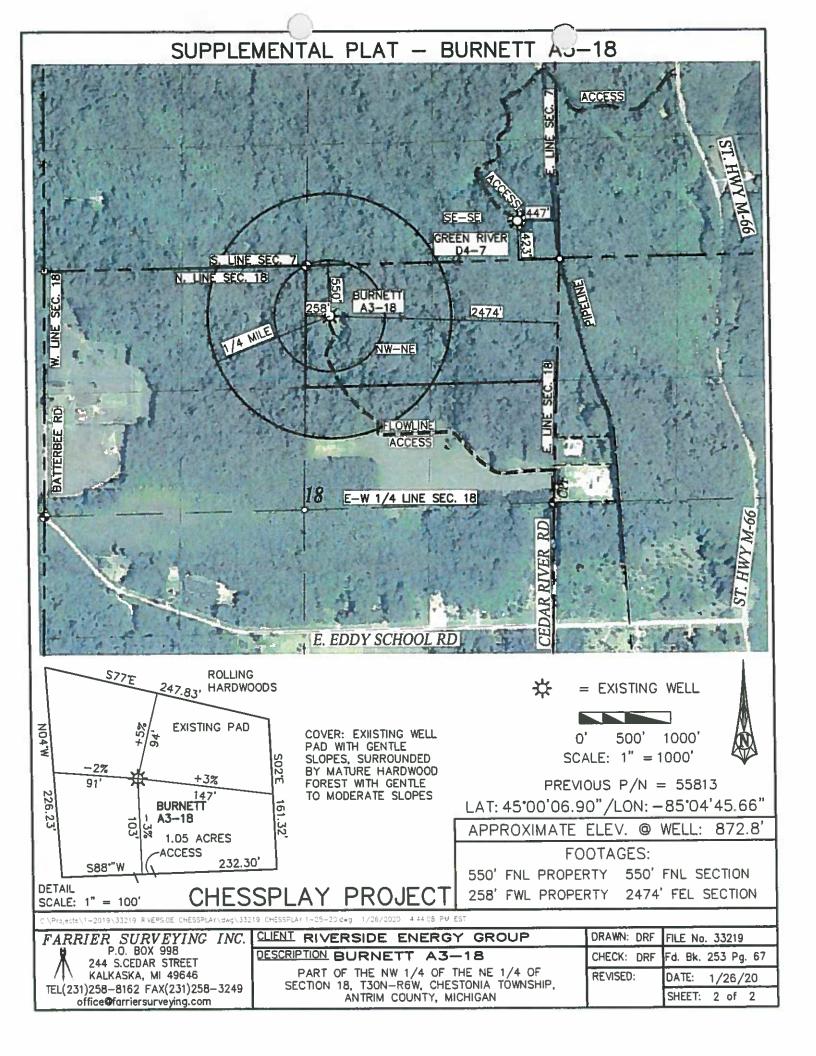
This information is required by authority of Part 615 Supervisor of Wells, or Part 625 Mineral Wells, of Act 451 PA 1994, as amended, in order to obtain a drilling permit. Applicant

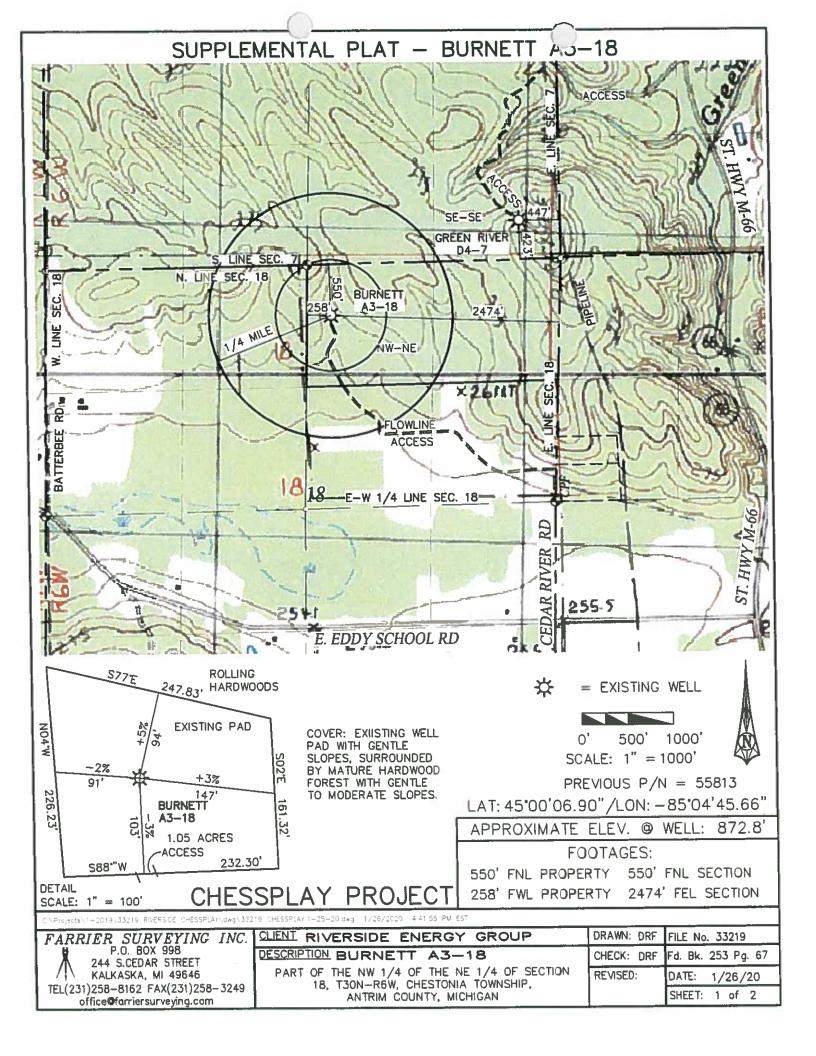
RIVERSIDE ENERGY GROUP

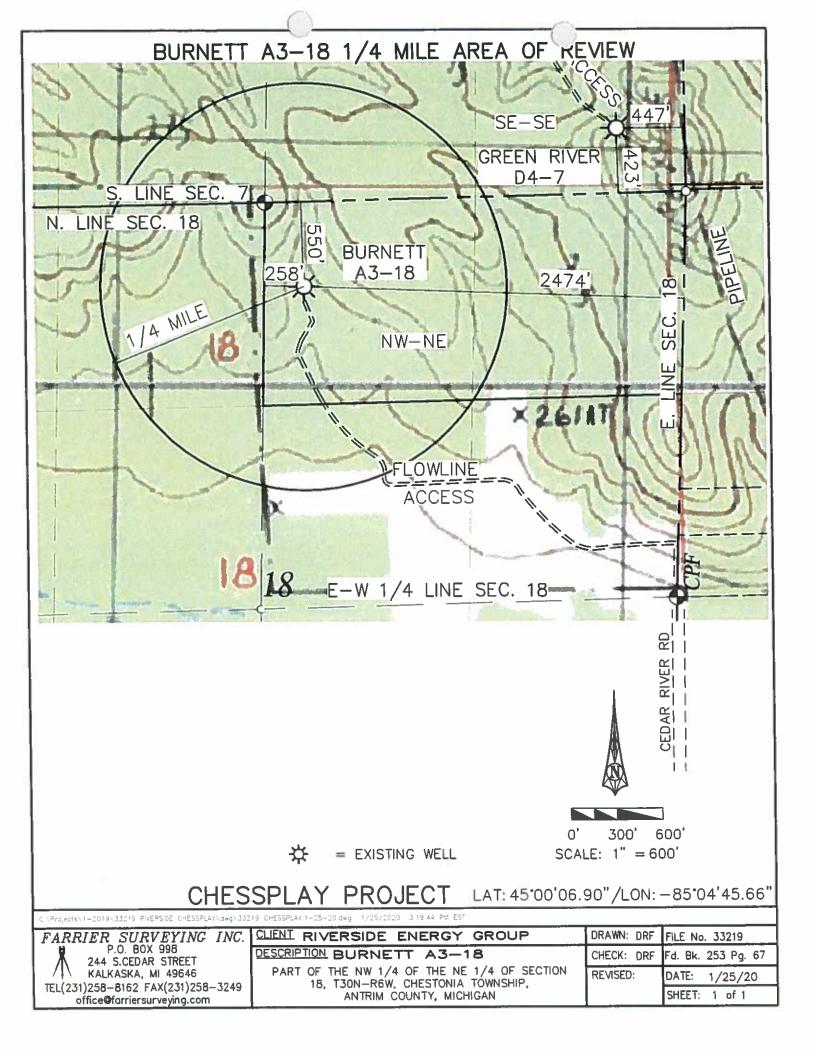
Well name and number

**BURNETT A3-18** 

1a. Surface location		Township	County
NW 1/4 of NW 1/4 of NE 1/4 of section 18 T	30N R 06W	CHESTONIA	ANTRIM
1b. If this is a directional well, bottom hole location will be		Township	County
1/4 of 1/4 of 1/4 of section T	R		
Instructions: Outline drilling unit for oil/gas wells (Part 615) or property the well in two directions from the nearest section, quarter section, and	boundary for mineral wells (Par unit (or property, Part 625) lines	t 625) and spot well loca	ition on plat shown. Locate
2. The surface location is			
550 ft. from nearest (N/S) N section line			
2474 ft. from nearest (E/W) E section line	PLAT BELOW R	EPRESENTS ONE (1 MILE SQUARE)	
550 ft. from nearest (N/S) N quarter section line	000000000000000000000000000000000000000	7	
258 ft. from nearest (E/W) W quarter section line	OF MICK	* / /	ĺ
3. Bottom hole will be (if directional)	DEAN R. FARRIER	7.00	ŀ
ft. from nearest (N/S)section line	PROFESSIONAL	00000 000000	
ft. from nearest (E/W)section line	SURVEYOR No. 41098	W S	
and	8 000 000 000 000 000 000 000 000 000 0	See The see of the see	
ft. from nearest (N/S)quarter section line	DOODS SCOOD OF SO		SE-SE
ft. from nearest (E/W)quarter section line		S. LINE SEC. 7	D4=7 E
4. Bottom hole will be (directional or straight)	N. UNE	\(\frac{15}{15}\)	BURNETT   2474'
550 ft. from nearest (N/S) Ndrilling unit line		1/4 MILE	277
258 ft. from nearest (E/W) Wdrilling unit line			NW-NE
5. Show access to stake on plat and describe if it is not readily accessible. FROM US-131, AT MANCELONA, GO	<u> </u>	/	
NORTH M-66 5.8 MILES. GO WEST ON EDDY			2-1-5
SCHOOL RD 0.4 MILE. GO NORTH ON CEDAR		<del></del>	
RIVER RD 0.3 MILE. FOLLOW ACCESS RD WEST		1	
AND NORTHERLY 3/4 MILE TO EXISTING BURNETT A3-18 WELL SITE.		18	
	<del>\$</del>		
6. Zoning Residential, effective date			
Other CHESTONIA IS UN-ZONED			
ON SEPARATE PLAT OR PLOT PLAN, LOCATE, IDENTIFY AND SH	OW DISTANCES TO:		
A. All roads, power lines, buildings, residences, fresh water wells,	and other man-made features,	within 600 feet of the sta	ike.
B. All lakes, streams, wetlands, drainage-ways, floodplains, environmental endangered species within 1320 feet of the stake.	onmentally sensitive areas, natu	ractivers, critical dune a	reas, and intedlened of
C. All type I and IIa public water supply wells within 2000 feet and	all type lib and lfl public water	supply wells within 800 f	eet of the well stake.
Name of Individual who surveyed site DEAN FARRIER	Company FARRIER SUR	Date (EYING (B253P67)	of survey 12-16-19
Address PO BOX 998, KALKASKA, MI 49646		Phot 231	ne -258-8162
I CERTIFY THE ABOVE INFORMATION IS COMPLETE	AND ACCURATE TO THE BES		
Circulation of lineared everyone (efficience)		Da	e
Signature or licensed surveyor (allix seal)	tren )		1-26-20







### RIVERSIDE ENERGY GROUP, CHESSPLAY PROJECT

**CONVERSION WELL: BURNETT A3-18** 



BURNETT A3-18 WELLHEAD AND PAD LOOKING NORTH



BURNETT A3-18 WELLHEAD AND PAD LOOKING EAST



BURNETT A3-18 WELLHEAD AND PAD LOOKING SOUTH



BURNETT A3-18 WELLHEAD AND PAD LOOKING

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